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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
DIVISION PORTLAND

THE STATE OF OREGON, EX REL.
DAN RAYFIELD, ATTORNEY GENERAL
FOR THE STATE OF OREGON,

Plaintiff,

v.

COINBASE, INC. AND COINBASE
GLOBAL, INC.,

Defendants.

No. 3:25-cv-00952-JR

**PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT**

I. INTRODUCTION

Plaintiff State of Oregon (the "State"), by and through its Attorney General, Dan Rayfield, opposes the request by defendants Coinbase, Inc. and Coinbase Global, Inc. (collectively,

“Defendants”) to extend the deadline for Defendants to respond to the State’s complaint to August 1, 2025.

II. BACKGROUND

On April 18, 2025, the State filed its securities enforcement action asserting claims under the Oregon Securities Law against Defendants in Multnomah County Circuit Court. The State’s counsel provided Defendants’ counsel a courtesy copy of the complaint the same day.

On April 24, 2025, Defendants’ counsel requested an additional 60 days to respond to the complaint, beyond the 30 days after acceptance of service Defendants would have had under Oregon state court rules. ECF 10-1 at 4. The State was skeptical that Defendants required a full three months to respond to the complaint given that Defendants already were represented by two full-service law firms and that Defendants previously had defended against similar securities enforcement litigation brought by the Securities and Exchange Commission (the “SEC”). Nonetheless, as a show of good faith, the State agreed to Defendants’ requested extension. *Id.*

Since then, rather than use the additional time to develop its response to the State’s complaint, Defendants have issued an unending stream of extremely broad records requests under the Oregon Public Records Law. At approximately 4:30 p.m. on Friday, May 2, Defendants issued public records requests to the Office of the Governor, the Oregon Department of Justice, the Oregon Department of Consumer and Business Services, and the Oregon Public Employee Retirement System. A week later, at approximately 4:30 p.m. on Friday, May 9, Defendants issued additional public records requests to the Office of the Governor, the Oregon Department of Justice, the Oregon Department of Consumer and Business Services, and the Oregon State Treasury. The next week, again at approximately 4:30 p.m. on Friday, May 16, Defendants issued another set of requests to the Office of the Governor, the Oregon Department of Justice, the Oregon Department

of Consumer and Business Services, and the Oregon State Treasury. On Friday, May 23, again at approximately 4:30 p.m., Defendants submitted requests to the Office of the Governor, the Oregon Department of Justice, the Oregon Department of Consumer and Business Services. Finally, on Friday, May 30, Defendants issued yet another set of requests the Oregon State Treasury, at approximately 4:30 p.m., and to the Oregon Department of Justice, at approximately 11:30 p.m. In total, Defendants have submitted seventeen sets of requests totaling approximately 60 pages, including five separate sets of requests to the Oregon Department of Justice, four sets of requests to the Office of the Governor, four sets of requests to the Oregon Department of Consumer and Business Services, and three sets of requests to the Oregon State Treasury, and a request to the Oregon Public Employee Retirement System.

On June 2, 2025, Defendants removed this case to this Court. The State believes removal of this state-law action brought to enforce Oregon law and to protect Oregon residents was improper and intends to move the Court to remand the case to Multnomah County Circuit Court.

III. ARGUMENT

Given that removal of this case to this Court was improper, the State is not interested in negotiating scheduling in a forum where the case does not belong. The State understands that Defendants intend to move to dismiss the State's complaint. The State should not be required to litigate that motion before its forthcoming motion to remand is decided.

At the same time, Defendants have taken advantage of the State's previous attempt to accommodate their representation that they needed a full three months to respond to the complaint by using the additional time to issue serial public records requests. Defendants' actions demonstrate that they have more than adequate attorney resources available to respond to the State's enforcement claims before August 1, 2025. Defendants should not be further rewarded for

their improper removal of this case to federal court by further delaying their time to respond to the State's complaint while the parties litigate the State's remand motion.

Defendants already have had more than a month to consider their response to the State's complaint. Under the circumstances, although Defendants' response is currently due June 9, 2025 pursuant to FRCP 81, as a reasonable compromise, the Court should require Defendants to respond to the State's complaint within 21 days of Defendants' removal of this case to this Court, i.e., June 23, 2025, which is the same amount of time Defendants would have had to respond had the complaint been served the day Defendants removed the case (under either FRCP 81 or FRCP 12).

IV. CONCLUSION

For the reasons stated above, the State respectfully requests that the Court deny Defendants' request to extend the time for Defendants to respond to the State's complaint to August 1, 2025, and order Defendants to respond to the complaint by June 23, 2025.

DATED this 6th day of June, 2025.

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